

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

United States Equal Employment Opportunity
Commission,

Plaintiff,

vs.

Camber Corporation,

Defendant.

Case No. 1:17cv1084 (AJT/JFA)

**Joint Motion to Enter an Agreed
Protective Order and Waiver of
Hearing**

To facilitate discovery in this case, the parties have agreed to the proposed Agreed Protective Order pursuant to Rule 26(c), Fed. R. Civ. P.

The parties move this Court for entry of the attached proposed Agreed Protective Order to expedite the flow of discovery materials, facilitate the prompt resolution of discovery disputes, protect certain materials designated as confidential, and ensure that protection is afforded only to material so designated.

The parties waive hearing on this joint motion.

FOR PLAINTIFF:

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By:

/s/

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**To seek admission pro hac vice*

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of February 2018, I filed the foregoing Joint Motion to Enter an Agreed Protective Order and waiver of Hearing with the [Proposed] Agreed Protective Order using the CM/ECF system, which will send a notification of such filing (NEF) to all ECF counsel of record in this matter.

s/David Staudt
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